

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
)

Advanced Television Systems)
and Their Impact upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

To: The Commission

**PETITION FOR RECONSIDERATION OF THE COMMISSION'S
MEMORANDUM OPINION AND ORDER ON RECONSIDERATION OF THE
FIFTH REPORT AND ORDER**

**Pappas Telecasting of the Midlands,
a California Limited Partnership**

Pappas Telecasting of Southern California, L.L.C.

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Pappas Telecasting of the Midlands, a California Limited Partnership ("Pappas/Midlands"), the permittee to construct a new UHF commercial television broadcasting station to operate on NTSC Channel 23 in Ames, Iowa,^{1/} and Pappas Telecasting of Southern California, L.L.C. ("Pappas/Southern California"), an applicant for a construction permit to build a new UHF commercial television broadcasting station on NTSC Channel 54 in Avalon, California,^{2/} (hereinafter Pappas/Midlands and

^{1/} File No. BPCT-950110KF, granted by an action of the Chief of the Commission's Mass Media Bureau, taken pursuant to delegated authority on February 19, 1998.

^{2/} File No. BPCT-860210KM, as amended. The application was originally filed
(continued...)

Pappas/Southern California are referred to collectively as "Pappas" or "Petitioners"), by counsel and in accordance with Section 1.429 of the Commission's Rules, 47 C.F.R. § 1.429 (1997), hereby respectfully petition the Commission to reconsider a portion of the *Memorandum Opinion and Order on Reconsideration of the Fifth Report and Order* in the above-captioned proceeding (the "*Fifth Report and Order Reconsideration Order*").^{2/}

SUMMARY

Pappas/Midlands urges the Commission to reconsider the *Fifth Report and Order Reconsideration Order's* determination to limit the initial eligibility for digital ("DTV") channel allotments to those persons who on April 3, 1997 held licenses or construction permits from the Commission for television stations. At least in the case of a person who can identify a DTV channel that may be allotted and paired with an NTSC channel for which a construction permit was first issued after April 3, 1997, without impacting either the NTSC or DTV environment, such a limitation upon initial eligibility for DTV channel allotments is counterproductive and contrary to the public interest. Pappas/Midlands can demonstrate that the allotment of DTV Channel 56 to

^{2/} (...continued)

on February 10, 1986 by Island Broadcasting Limited Partnership, a California Limited Partnership ("Island") and prosecuted for approximately 12 years in that capacity, through a lengthy comparative hearing before the Commission, an appeal to the United States Court of Appeals for the District of Columbia Circuit, and a remand to the Commission by the Court. See Paragraph 8, *infra*. The application was amended on January 30, 1998 in order to substitute Pappas/Southern California for Island as the applicant.

^{3/} FCC 98-23, adopted February 17, 1998 and released February 23, 1998, 13 FCC Rcd ____, 63 Fed. Reg. 15774 (April 1, 1998).

Ames, Iowa, to be paired with NTSC Channel 23 for which a construction permit was recently issued to Pappas/Midlands, would have no effect upon existing NTSC or DTV channel allotments, stations, or pending applications. Under those circumstances, Pappas/Midlands -- as the holder of a construction permit for NTSC Channel 23 in Ames, albeit that such permit was granted after April 3, 1997 -- should be found initially eligible for the allotment of DTV Channel 56 to Ames.

Pappas/Southern California is currently prosecuting an uncontested application for a construction permit to build a new television station on NTSC Channel 54 in Avalon. Thus -- like Pappas/Midlands -- Pappas/Southern California is not initially eligible for a DTV allotment, and no such allotment has been made to be paired with NTSC Channel 54 in Avalon. Pappas/Southern California urges that the eligibility limitation be removed in Pappas/Southern California's case, due to the unique combination of four significant equities presented here.

First, given the sequence of Congressional legislation and Commission rulings -- and through no fault of Pappas/Southern California or Island -- it would not have been possible for Island or Pappas/Southern California to have obtained a construction permit for NTSC Channel 54 in Avalon by April 3, 1997.

Second, Pappas/Southern California is the successor to Island, which -- along with seven competing applicants -- has been attempting to secure a construction permit for NTSC Channel 54 in Avalon for more than 12 years. Considerable resources have been expended by Island and the other applicants, and but for the

Commission's own action that "froze" the proceeding for the last four years, Island or one of the other applicants would almost certainly have been granted a construction permit for NTSC Channel 54 prior to April 3, 1997. It would therefore be inequitable in the extreme for the Commission, whose self-imposed freeze prevented such a grant, to cite the applicants' failure to have obtained such a grant as a basis for holding Pappas/Southern California initially ineligible for a DTV channel allotment.

Third, prior to the *Fifth Report and Order* in this proceeding, 12 FCC Rcd 12809 (1997), the Commission repeatedly acknowledged in the course of the proceeding that applicants such as Island, who filed their applications prior to October 24, 1991, are initially eligible to obtain a second channel for DTV service during the transitional period. As recently as 1996, the Commission decided that Avalon would receive a second channel for DTV service, to be paired with NTSC Channel 54. The Commission appears to have misread the Telecommunications Act of 1996 to require that persons not holding a license or a construction permit for a television station as of April 3, 1997 are not eligible for a DTV channel allotment. Pappas/Southern California herein demonstrates that it is within the Commission's power to expand the universe of persons deemed initially eligible for such allotments, by adjusting the date upon which the DTV licenses were first issued.

Fourth, Pappas/Southern California proposes a unique program offering to benefit the substantial numbers of ethnic and racial minorities in the Los Angeles Metropolitan Area (in which Avalon is located), whose first language or second language is not English but one of the many Asian languages. In order to make such a

program service viable, Pappas requires a second 6-MegaHertz channel to be combined with Channel 54.

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INTRODUCTION

1. In Paragraphs 10 through 16 of the *Fifth Report and Order Reconsideration Order*, the Commission decided that applicants for construction permits to build new NTSC television broadcasting stations whose applications, as of April 3, 1997, had not yet been granted by the Commission would -- upon their subsequent grant -- not be entitled to the award of a second channel for DTV service. Petitioners ask the Commission to reconsider that determination, at least with respect to (i) those post-April 3, 1997 grantees of permits to construct new NTSC television broadcasting stations -- like Pappas/Midlands -- who can demonstrate to the Commission that an available channel exists for DTV service that can be allotted without any impact upon NTSC or DTV stations, channel allotments, or pending

applications, and (ii) those parties who on April 3, 1997 were still prosecuting applications for construction permits to construct new NTSC television broadcasting stations -- like Pappas/Southern California -- who can demonstrate substantial and unique equities in favor of the allotment of a second channel for DTV service.

PAPPAS/MIDLANDS' REQUEST FOR RELIEF

2. Pappas/Midlands' consulting broadcast engineer has determined that Channel 56 may be allotted to Ames as a so-called "paired" DTV channel allotment for NTSC Channel 23. Pappas's consulting engineer has further determined that Channel 56 may be allotted to Ames without causing any impact upon any existing NTSC channel allotment, NTSC station, or pending NTSC application, or any DTV channel allotment, DTV station, or pending DTV application. See Engineering Statement of Neil M. Smith of the firm of Smith and Fisher in Washington, D.C., Pappas/Midlands' broadcast engineering consultant, dated April 30, 1998 and appended to this Petition for Reconsideration of the Commission's Memorandum Opinion and Order on Reconsideration of the Fifth Report and Order ("Petition"), as Appendix A.

3. It appears self-evident, and unnecessary of extensive argumentation, that the allotment of a channel for DTV service by an NTSC permittee whose construction permit was granted after April 3, 1997 -- where such allotment may be made without affecting either the NTSC or DTV environments -- would serve the public interest. Such an allotment would allow the NTSC permittee to enjoy the same benefits as its competitors in the market, *i.e.*, enabling the NTSC permittee to conduct

program transmissions during the transitional period on both NTSC and DTV channels. Such an allotment would avoid penalizing NTSC permittees whose applications were granted after April 3, 1997, sometimes -- as in the case of Pappas/Midlands' application for the new station in Ames -- through no fault of their own.^{4/}

4. Pappas/Midlands' request for relief in this Petition partakes of the principle of "no harm -- no foul." Given that Pappas/Midlands can demonstrate that the allotment of DTV Channel 56 to Ames will have no impact upon either NTSC or DTV stations, applications, or channel allotments, it would be not be sound policy for the Commission to decline to make such an allotment.^{5/}

^{4/} Pappas/Midlands' application for a construction permit to build a new NTSC television station to operate on Channel 23 in Ames was filed with the Commission on January 10, 1995, more than two years prior to the April 3, 1997 date. Because mutually-exclusive applications were filed, Pappas/Midlands was unable to obtain a grant of its application until February 19, 1998, through no fault of Pappas/Midlands. The grant of Pappas/Midlands' application only became possible as a consequence of the Balanced Budget Act of 1997, Pub. L. No. 105-33, 111 Stat. 251 (1997), which enabled parties in Pappas/Midlands' position to pay competing applicants amounts exceeding their legitimate and prudent expenses incurred in preparing, filing, and prosecuting their applications, as consideration for the voluntary dismissal of their applications. The Balanced Budget Act was signed into law by the President on August 5, 1997, more than four months after the April 3, 1997 date.

^{5/} It is true that the Telecommunications Act of 1996, 47 U.S.C. § 336(a)(1), Pub. L. No. 104-104, 110 Stat. 56 (1996), limited the "initial eligibility" for DTV licenses to persons that, as of the date of the issuance of such licenses by the Commission, held either a construction permit or a license (or both) for a television broadcasting station. In the *Fifth Report and Order* in this proceeding, 12 FCC Rcd 12809 (1997), the Commission decided on its own to issue the initial DTV licenses as of the date of the adoption of the *Fifth Report and Order*, i.e., April 3, 1997. That decision was not mandated by Congress in the Telecommunications Act of 1996, and the Commission may revisit it where, as here, Pappas/Midlands has demonstrated good grounds to do so.

5. Pappas/Midlands therefore urges the Commission to modify the *Fifth Report and Order Reconsideration Order* in order to render permittees of NTSC stations whose applications for construction permits were granted after April 3, 1997 initially eligible to obtain allotments of second channels for DTV service, where such permittees can demonstrate to the Commission that such allotments would not affect NTSC or DTV stations, applications, or allotments.

PAPPAS/SOUTHERN CALIFORNIA'S REQUEST FOR RELIEF

6. Pappas/Southern California became an applicant for a construction permit for a new NTSC station on Channel 54 in Avalon by amending into, and becoming the successor applicant with respect to, the long-pending application of Island. *See* note 2, *supra*. Pappas/Southern California's ability to become the sole applicant for the Channel 54 permit in Avalon -- by agreeing to pay Island and seven mutually-exclusive applicants amounts exceeding their legitimate and prudent expenses incurred in the preparation, filing, and prosecution of their competing applications -- only arose as a consequence of the Balanced Budget Act of 1997 and its instruction to the Commission to waive for 180 days any Commission regulations as necessary to permit competing applicants for initial authorizations for commercial broadcasting stations filed prior to July 1, 1997 to enter into agreements to procure the removal of the conflicts among and between their applications. *See generally Implementation of Section 309(j) of the Communications Act -- Competitive Bidding for Commercial Broadcast and Instructional Television Fixed Service Licenses, Notice of Proposed Rulemaking*, 12 FCC Rcd 22363 (1997) ("*Section 309(j) Notice of Proposed*

Rulemaking"); *see also* note 4, *supra*. The Balanced Budget Act of 1997 was not signed into law until August 5, 1997, more than four months after April 3, 1997. Thus, on the date fixed in the *Fifth Report and Order* for the issuance of the initial DTV licenses, which under the Telecommunications Act of 1996 is the criterion for determining initial eligibility for such licenses, *see* note 5, *supra*, Pappas/Southern California was not, and could not have been, an applicant for the construction permit for the NTSC Channel 54 allotment in Avalon.

7. The first equity running in favor of making a DTV allotment to be paired with NTSC Channel 54 in Avalon, then, is the fact that the sequence of Congressional legislation and Commission decision-making was such that Pappas/Southern California was foreclosed from ever having had an opportunity to have rendered itself initially eligible for such an allotment.

8. The second equity is the length of time that the Avalon Channel 54 case has persisted at the Commission. The first of the eight surviving applications, that of Coastal Broadcasting Partners, a California Limited Partnership (File No. BPCT-851206KE), was filed nearly 13 years ago. The mutually-exclusive applications were designated for a comparative hearing 12 years ago. The case proceeded through an *Initial Decision* by an administrative law judge in 1989,^{6/} a *Review Board Decision*

^{6/} *Coastal Broadcasting Partners*, 4 FCC Rcd 2345 (Admin. Law Judge, 1989).

in 1991,^{7/} two successive Commission *Memorandum Opinions and Orders* in 1992,^{8/} and a ruling by the United States Court of Appeals for the District of Columbia Circuit in 1994 remanding the case back to the Commission.^{9/} Throughout this marathon proceeding, Island and the other applicants continued to prosecute their applications in good faith and at considerable expense. That the proceeding did not come to an end prior to April 3, 1997 is certainly not the result of any action or inaction on the part of Island or its mutually-exclusive rivals: the Commission, in the wake of *Bechtel v. FCC*, 10 F.3d 875 (D.C. Cir. 1993), which invalidated the Commission's selection criterion favoring the maximum integration of applicant ownership into station management in choosing among multiple applicants for a new broadcast station authorization, elected to "freeze" the further processing of cases such as the Avalon Channel 54 proceeding, and that freeze has persisted for four years. *Public Notice, FCC Freezes Comparative Hearings*, 9 FCC Rcd 1055, *modified*, 9 FCC Rcd 6689 (1994), *further modified*, 10 FCC Rcd 12182 (1995). Absent that freeze, imposed by the Commission and held in place well beyond April 3, 1997, Island or one of the seven competing applicants would almost certainly have received a construction permit by April 3, 1997 and would thus have been initially eligible for a DTV channel allotment under the *Fifth Report and Order*. To conclude now -- on the threshold of the end of this 13-year ordeal -- that the emergent permittee should be placed at a competitive

^{7/} *Coastal Broadcasting Partners*, 6 FCC Rcd 4242 (Rev. Bd. 1991).

^{8/} *Coastal Broadcasting Partners*, 7 FCC Rcd 1432, *aff'd on reconsideration*, 7 FCC Rcd 6594 (1992).

^{9/} *Avalon Broadcasting, a California Limited Partnership, et al. v. FCC*, Case Nos. 92-1116, 92-1117, 92-1118, and 92-1574 (D.C. Cir. March 1, 1994).

disadvantage with respect to other television stations in the Los Angeles market, all of whom will enjoy a second channel for DTV service during the transitional period, would be an act of extraordinary unfairness.

9. The third equity favoring the grant of the relief sought by Pappas/Southern California in this Petition is that applicants have been consistently assured during the course of the Commission's lengthy deliberations in the DTV rule making proceeding that if their applications had been filed by October 24, 1991, they would be entitled during the transitional period to a second channel for DTV transmissions. Throughout the DTV proceeding, the Commission has repeatedly emphasized the equities running in favor of applicants whose applications were on file prior to October 24, 1991 for the award of second channels for DTV service. *See, e.g., Notice of Proposed Rulemaking*, 6 FCC Rcd 7024, 7025 (1991) (expressing an intention to include within the class of broadcasters initially eligible for a DTV channel "those parties that are in the process of obtaining NTSC authorizations or licenses and have invested resources in reliance on our existing licensing scheme"); *see also Second Report and Order/Further Notice of Proposed Rulemaking*, 7 FCC Rcd 3340, 3343 (1992) (applicants for NTSC authorizations whose applications were on file as of October 24, 1991 found to be initially eligible for DTV channel allotments). Indeed, as recently as 1996, in the *Sixth Further Notice of Proposed Rule Making*, 11 FCC Rcd 10968 (1996), the Commission proposed to allot DTV Channel 31 to Avalon, to be paired with the NTSC Channel 54 allotment. *Id.* at 11023.

10. The fourth equity is unique to Pappas/Southern California.

Pappas/Southern California intends to operate its NTSC Channel 54 in combination with its DTV channel -- if awarded -- and to "narrowcast," on a subscription television ("STV") basis, a multiple-channel television service on the 12 MegaHertz of spectrum thus combined, using digitally-encoded transmissions to provide several program channels on each 6-MegaHertz allotment. (Pappas/Southern California acknowledges that the Commission's authorization to transmit in such a manner will be required.) In this manner, Pappas/Southern California's NTSC and DTV channels would be simulcasting the same basic program, but in multiple languages on each channel in order to serve the many and diverse Asian-language-speaking racial and ethnic communities residing in the Los Angeles Metropolitan Area. For example, within the spectrum constituting Channel 54 (710-716 MegaHertz) an entertainment or informational program might be available to subscriber/viewers on multiple channels in Japanese, Korean, Mandarin Chinese, and other Chinese dialects; on the second (or DTV) channel, the identical program could be watched and heard in Vietnamese, Tagalog, Malay, Indonesian, Khmer, Lao, *etc.* Some of this programming may vary from channel to channel by language group, and some may originate in the country of origin of the subscriber/viewers and may differ from the programming seen by other subscriber/viewers. Some of this programming will constitute news and information in the language of the subscriber/viewers and will relate to the countries of origin of those subscriber/viewers. By operating across a full 12 MegaHertz of spectrum, such a program service can be offered on a reasonably cost-effective basis to these non-English-speaking minority populations. Pappas/Southern California's programming plans provide the Commission with a unique opportunity to benefit Asian-language-

speaking residents of Southern California. The Commission has long recognized that programming that addresses the needs of underserved minorities significantly advances the public interest.

11. The unique combination of equities running in favor of awarding a DTV channel allotment to Avalon, to be paired with NTSC Channel 54, is substantial. Any one of them, standing alone, would support revisiting the Commission's decision to restrict initial eligibility to those parties who held licenses or construction permits for television stations as of April 3, 1997.^{10/} In combination, these equities overwhelmingly establish the need for a special disposition in the case of Avalon's NTSC Channel 54. Moreover, given the uniqueness of that combination of equities, it is highly unlikely that the Commission's grant of the relief requested in this Petition would set a precedent that would compel the grant of similar relief to other parties; it is too remote to imagine that any other party could assemble the equities that Pappas/Southern California here presents.

12. As noted in Paragraph 9, *supra*, the Commission previously found a DTV channel that could be allotted to Avalon and paired with NTSC Channel

^{10/} It should again be emphasized, *see* note 5, *supra*, that while the Telecommunications Act of 1996 restricted those initially eligible for DTV licenses to persons who as of the date of the issuance of such licenses held licenses or construction permits (or both) for television stations, 47 C.F.R. § 336(a)(1) (1997), it was the Commission -- not Congress -- that decided that the date for the issuance of the DTV licenses would be April 3, 1997. *Fifth Report and Order, supra*. Nothing prevented, or prevents, the Commission from changing that date, or for making an exemption, for the benefit of those persons, such as Pappas/Southern California, who can present unique and compelling equities such as are presented in this Petition.

54. See *Sixth Further Notice of Proposed Rule Making*, *supra*. Although the *Sixth Report and Order* in this proceeding, 12 FCC Rcd 14588 (1997), did not carry that allotment forward, that is because in the *Fifth Report and Order* the Commission determined to restrict initial eligibility for such allotments to those persons who, on the date of the adoption of the *Fifth Report and Order*, already held licenses or construction permits for television stations. In the *Fifth Report and Order Reconsideration Order*, the Commission affirmed that determination. Between the time of the *Fifth Report and Order* and the *Fifth Report and Order Reconsideration Order*, two developments occurred that warrant reconsideration of that determination. First, Pappas/Southern California -- as a consequence of the Balanced Budget Act of 1997 -- became the applicant for the construction permit for the NTSC Channel 54 allotment to Avalon and thus, for the first time, had an opportunity to urge the Commission to rethink this matter. Secondly, in the *Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order*, FCC 98-24, adopted February 17, 1998 and released February 23, 1998, 13 FCC Rcd _____, 63 Fed. Reg. 13546 (March 20, 1998), the Commission expanded the so-called "core spectrum" within which DTV channel allotments may preferably be found.^{11/} Now that the Commission has available to it additional channels in the DTV spectrum core, and given a basis for deciding that

^{11/} On April 20, 1998, Island submitted a Petition for Further Reconsideration of the Commission's *Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order*. Island's Petition urges the Commission to allot a second channel to Avalon, to be paired with NTSC Channel 54. Pappas/Southern California endorses the relief requested in Island's Petition for Further Reconsideration and believes that if the Commission will adjust the basis for determining the initial eligibility for such a second channel allotment, by granting the relief requested in this Petition, Island's Petition for Further Reconsideration can and should be granted.

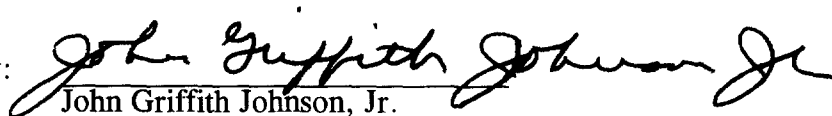
Pappas/Southern California -- as Island's successor -- should be deemed to be initially eligible for a DTV channel allotment for the reasons hereinbefore stated, the Commission should grant the relief requested herein and in Island's April 20, 1998 Petition for Further Reconsideration of the *Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order* and should endeavor to identify a DTV channel for allotment to Avalon to be paired with NTSC Channel 54.

Respectfully submitted,

**PAPPAS TELECASTING OF THE MIDLANDS,
A CALIFORNIA LIMITED PARTNERSHIP**

**PAPPAS TELECASTING OF SOUTHERN
CALIFORNIA, L.L.C.**

By:


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May 1, 1998

APPENDIX A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of PAPPAS TELECASTING OF THE MIDLANDS ("Pappas"), permittee of a new television station to operate on Channel 23 in Ames, Iowa.

A study has been conducted to determine whether or not a DTV channel could be allotted to Ames for use at the Pappas site. Attached hereto is a tabulation which demonstrates that DTV Channel 56 can be so utilized.

I declare under penalty of perjury that the foregoing statements and the attached tabulation, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to be "Neil M. Smith", with a long horizontal stroke extending to the right.

NEIL M. SMITH

April 30, 1998

FIGURE 1

ALLOCATION STUDY
PROPOSED DTV CHANNEL 56
AMES, IOWA

<u>Channel</u>	<u>Nearest Assignment</u>	<u>Type</u>	<u>Separation (mi.)</u>		<u>Result</u>
			<u>Required</u>	<u>Proposed</u>	
41	KJMH, Burlington, IA	DTV	--	145.0	OK
42	KIMT, Mason City, IA	DTV	--	115.8	OK
48	KPXR, Cedar Rapids, IA	NTSC	<15, >60	95.2	OK
49	Alloc., Estherville, IA	NTSC	<15, >60	127.4	OK
51	KGAN, Cedar Rapids, IA	DTV	--	95.1	OK
52	Alloc., Carroll, IA	NTSC	<15, >60	67.3	OK
53	KQTV, St. Joseph, MO	DTV	--	153.0	OK
54	Alloc., Keosauqua, IA	NTSC	<15, >60	113.0	OK
55	KWWL, Waterloo, IA	DTV	<20, >55	99.9	OK
<u>56</u>	KWQC-TV, Davenport, IA	DTV	139	163.1	+24.1
57	Alloc., Burlington, IA	NTSC	<6, >55	141.2	OK
58	WHBF-TV, Rock Island, IL	DTV	--	163.1	OK
59	WOI-TV, Ames, IA	DTV	--	0.9	OK
60	WEHS-TV, Aurora, IL	NTSC	<15, >60	307.6	OK
61	WVTV, Milwaukee, WI	DTV	--	304.4	OK
63	Alloc., Des Moines, IA	NTSC	<15, >60	14.5	OK
64	Nothing within 200 miles	--	--	--	--

NOTE: Study based on coordinates 41° 47' 47", 93° 36' 39"